

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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BRIAN WOLOSHIN, on behalf of himself :
and all others similarly situated, :

Plaintiff, :

v. :

AETNA LIFE INS. CO., :

Defendant. :
-----X

Case No. 7:07 CV 6664 (KMK)

Magistrate Judge Yantis

ECF Case

**JOINT STIPULATION AND ORDER EXTENDING DEFENDANT'S TIME TO
RESPOND TO PLAINTIFF'S FIRST REQUEST FOR THE PRODUCTION OF
DOCUMENTS DATED FEBRUARY 18, 2008**

It is hereby stipulated and agreed by plaintiff Brian Woloshin ("Woloshin"), by and through his attorneys, and defendant Aetna Life Insurance Company ("Actna"), by and through its attorneys, that:

1. The time for Actna to respond by producing documents and/or objecting to Woloshin's First Request for the Production of Documents dated February 18, 2008 (the "Requests") shall be extended through and including May 5, 2008;

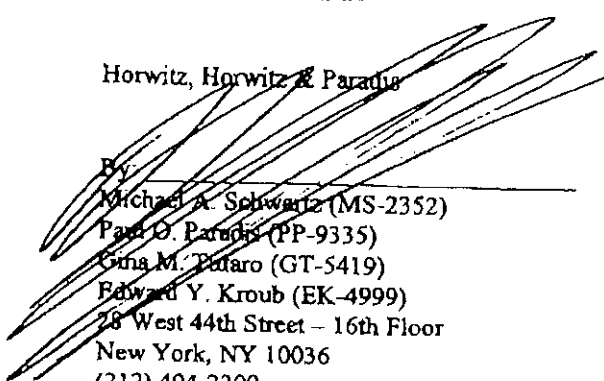
2. Prior to May 5, 2008 Actna will produce, under cover of letter, documents responsive to Requests 1, 2, 3, 4, 6, and 7 within two weeks of the Court entering an appropriate protective order. Such productions will be subject to and without waiving Actna's right to assert objections to these Requests, which shall be set forth in Actna's May 5, 2008 responses; and

3. Plaintiff and Defendant agree to submit an amended Form 26(f) Report of the Parties thereby extending by 45 days all of the deadlines listed in ¶¶ 3-4 of the 26(f) Report of the Parties dated November 5, 2007, as follows:

- (a) All discovery, including depositions of expert witnesses will be commenced immediately and completed (not propounded) by January 5, 2009.
- (b) Factual discovery to be completed by October 13, 2008.
- (c) Class Certification:
 - (i) Motion for Class Certification to be filed on or before August 29, 2008;
 - (ii) Opposition to be served and filed on or before October 13, 2008; and,
 - (iii) Reply to be served and filed on or before November 10, 2008.
- (d) Reports from retained expert witnesses under Rule 26(a)(2) due:
 - (i) Plaintiff to identify expert(s) and provide report(s) by August 11, 2008;
 - (ii) Defendant to identify expert(s) and provide report(s) by September 29, 2008;
 - (iii) Plaintiff and Defendant to identify rebuttal expert(s) and provide rebuttal report(s), if any, by November 29, 2008; and,
 - (iv) completion of all expert depositions by January 5, 2009.
- (e) Expert discovery to be completed by January 5, 2009.
- (f) All dispositive motions will be filed by January 29, 2009.

CONSENTED TO BY:

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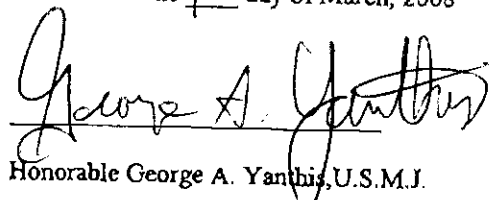
-and-

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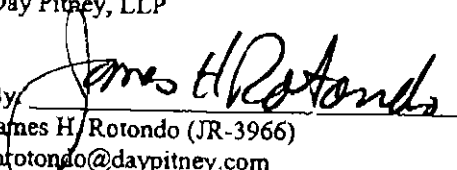
Attorneys for Plaintiff
Brian Woloshin, on behalf of himself
and all others similarly situated

Dated March 12, 2008

So Ordred this 13 day of March, 2008


Honorable George A. Yanthis, U.S.M.J.

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Attorneys for Defendant
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Dated March 12, 2008

Motions are to be filed
in accordance with rules

of Judge Karas

Telephone conference scheduled

for September 09, 2008 at
9:00 A.M. TT to initiate the
case.

CAY/DA